

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Friday, June 20, 2014 9:14:35 AM

-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, June 20, 2014 9:08 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 20, 2014 - 09:08

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Stuart

Last Name: Walker

Title: Code Administration Director

Organization you are affiliated with: City of Lubbock

City: Lubbock

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

The City of Lubbock does not support the recommendation of the Sunset Commission to deregulate the registration of Code Enforcement Officers.

This state registration is vital to Lubbock in establishing its employees as professionals and experts in their field in venues such as legal proceedings, courts of law, and interactions with private and commercial citizens.

Lubbock has 19 Registered Code Enforcement Officers and Officers in Training.

The City of Lubbock relies on the state and DSHS to regulate and form the standards that Registered Code Enforcement Officers must meet in order to enforce and properly protect the citizens of Lubbock. Not having these standards diminishes the minimal qualifications and training prescribed and takes away from the professional recognition needed for a Registered Code Enforcement Officer to effectively do their job.

State wide standards and certification are important to maintain continuity and form a basis from which every Registered Code Enforcement Officer begins their understanding of Federal, State, County, and Municipal law and ordinances. This recommendation does not only affect municipalities, but with many local jurisdictions having one employee that may "wear many hats". One person may be the local fire marshal, code enforcement officer, and building official. Being a Registered Code Enforcement Officer is as important in these instances as carrying certifications or registrations for the other duties.

A great example of the importance of this credential: You are standing in a court of law. Would a peace officer carry the same professional status if they were not certified or registered by the state? Registered Code Enforcement officer are often the front line battleground for public health and safety. Being a Registered Code Enforcement Officer gives an officer a solid footing on knowledge of state law, local ordinances, and local procedures when citing and abating these nuisances.

We recommend that you do not abolish this essential credential to the Registered Code Enforcement Officers of Texas, but to merely move it along with the Registered Sanitarian credential to TDLR.

Thank you for your time and consideration in this matter. Please do not hesitate to contact me with and questions or further discussion.

Any Alternative or New Recommendations on This Agency: If DSHS cannot continue to support the Registered Code Enforcement Officer process, move credentialing to TDLR.

My Comment Will Be Made Public: I agree